

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 21-3032 (MBK)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MARCH 30, 2022 AT 10:00 A.M.**

*Parties are directed to <https://www.njb.uscourts.gov/LTL>
for appearing via Court-Solutions or in-person, or observing via zoom*

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

MATTERS IN THE BASE CASE

CONTESTED MATTERS NOT GOING FORWARD

1. Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund For Payment of Talc Claims [Dkt. 8] (the "QSF Motion").

Status: This matter has been adjourned to the omnibus hearing on May 4, 2022.

2. Debtor's Motion for an Order (A) Authorizing the Filing Under Seal of Certain Confidential Commercial Information in Connection with the QSF Motion [Dkt. 9].

Status: This matter has been adjourned to the omnibus hearing on May 4, 2022.

3. Application of the Official Committee of Talc Claimants for Retention of Houlihan Lokey Capital, Inc. as Investment Banker Under Bankruptcy Code Section 328(a) Effective as of December 17, 2021 [Dkt. 953].

Status: The Debtor understands that the Official Committee of Talc Claimants I ("TCCI") will seek to adjourn this matter.

4. Application of the Official Committee of Talc Claimants I for Retention of the Brattle Group, Inc. as Talc Consultants [Dkt. 1289].

Status: The Debtor understands that TCC I will seek to adjourn this matter.

CURRENTLY UNCONTESTED MATTER GOING FORWARD

5. Motion by the United States Trustee for an Order Appointing an Independent Fee Examiner and Establishing Procedures [Dkt. 1812] (the "Fee Examiner Motion").

Status: This matter is going forward.

Related Documents:

- A. Application for Order Shortening Time [Dkt. 1813].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1820].
- C. Amended Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1821].
- D. The Debtor expects to file a Statement In Support of the Fee Examiner Motion in advance of the hearing.

Objections Received: None to date. Pursuant to the Amended Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice, objections to the Fee Examiner Motion may be presented at the hearing.

CONTESTED MATTERS GOING FORWARD

6. Application for Retention of FTI Consulting, Inc. as Financial Advisor for the Official Committee of Talc Claimants Effective December 13, 2021 [Dkt. 954].

Status: This matter is going forward.

Objection Deadline: January 6, 2022 (Debtor); January 10, 2022 (United States Trustee)

Related Documents:

- A. Supplemental Certification of Matthew Diaz in Support of Application for Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Talc Claimants II Effective December 13, 2021 [Dkt. 1111].
- B. Order Authorizing Interim Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Tal Claimants II Effective December 13, 2021 [Dkt. 1132].
- C. Order Authorizing Interim Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Tal Claimants II Effective December 13, 2021 [Dkt. 1134].

Objections Received:

- D. Debtor's Omnibus Objection to Application of the Official Committee of Talc Claimants for Retention of Houlihan Lokey Capital, Inc. as Investment Banker Under Bankruptcy Code Section 328(a) Effective as of December 17, 2021 and Application for Retention of FTI Consulting, Inc. as Financial Advisor for the Official Committee of Talc Claimants Effective December 13, 2021 [Dkt. 1087].
 - E. Objection of the United States Trustee to the Application of the Official Committee of Talc Claimants II for Retention of FTI Consulting, Inc., as Financial Advisor [Dkt. 1108].
7. Debtor's Application for Retention of Orrick, Herrington & Sutcliffe LLP as Special Talc Litigation Appellate Counsel, Effective as of October 14, 2021 [Dkt. 1456].

Status: TCC I has agreed to a proposed form of order, which proposed order reflects informal comments received from the United States Trustee. The Debtor believes that the proposed form of order resolves TCC I's objection to this matter.

Objection Deadline: March 14, 2022

Related Documents: None.

Objections Received:

- A. TCC I (I) Supplemental Objection to Debtor's Applications for Authority to Retain Certain Law Firms, and (II) Objection to Orrick's Retention [Dkt. 1600].
- 8. Travelers Casualty and Surety Company's Motion for an Order Granting Relief From the Automatic Stay to Allow the NJ Coverage Action to Proceed [Dkt. 1488].

Status: This matter is going forward.

Objection Deadline: March 16, 2022, 12:00 p.m., Eastern Time.

Related Documents:

- A. Determination of Adjournment of Request Granted [Dkt. 1591].
- B. Stipulation and Agreed Order Regarding Adjournment of New Jersey Coverage Action Plaintiff-Insurers' Motion for an Order (I) Confirming That the Automatic Stay Does Not Apply to the New Jersey Coverage Action or, in the Alternative, (II) Granting Relief From the Automatic Stay to Allow the New Jersey Coverage Action to Proceed [Dkt. 1592] (the "NJ Coverage Action Stipulation").
- C. Reply Memorandum in Support of Travelers Casualty and Surety Company's Motion for an Order Granting Relief from the Automatic Stay to Allow the NJ Coverage Action to Proceed [Dkt. 1869].

Objections Received:

- D. TCC I Response in Opposition to (1) Travelers Casualty and Surety Company's Motion for an Order Granting Relief From the Automatic Stay to Allow the NJ Coverage Action to Proceed and (2) New Jersey Coverage Action Plaintiff-Insurers' Motion for an Order (I) Confirming That the Automatic Stay Does Not Apply to the New Jersey Coverage Action or, in the Alternative, (II) Granting Relief From the Automatic Stay to Allow the New Jersey Coverage Action to Proceed [Dkt. 1738] (the "TCC I Stay Objection").
- E. Debtor's Omnibus Objection to Insurers' Motions for Relief From the Automatic Stay [Dkt. 1739] (the "Debtor's Stay Objection").
- 9. Motion by the New Jersey Coverage Action Plaintiff-Insurers for an Order (I) Confirming That the Automatic Stay Does Not Apply to the New Jersey Coverage Action or, in the Alternative, (II) Granting Relief From the Automatic Stay to Allow the New Jersey Coverage Action to Proceed [Dkt. 1491].

Status: This matter is going forward.

Objection Deadline: March 16, 2022, 12:00 p.m., Eastern Time.

Related Documents:

- A. Adjournment Request [Dkt. 1589].
- B. NJ Coverage Action Stipulation.
- C. New Jersey Coverage Action Plaintiff-Insurers' Omnibus Reply in Further Support of Motion for an Order (I) Confirming That the Automatic Stay Does Not Apply to the New Jersey Coverage Action or, in the Alternative, (II) Granting Relief From the Automatic Stay to Allow the New Jersey Coverage Action to Proceed [Dkt. 1866].

Objections Received:

- D. TCC I Stay Objection.
 - E. Debtor's Stay Objection.
10. Motion of Official Committee of Talc Claimants II² for Modification of the Court's Order Regarding: (A) Debtor's Motion for an Order Determining That the United States Trustee's Notice of "Reconstituted and Amended" Talc Claimants Committee Is Invalid and Reinstating That Committee; and (B) Motion for Order Vacating Appointment of Second Official Committee of Talc Claimants and Addition of New Committee Members Filed by Arnold & Itkin LLP to Authorize TCC II to Continue to Exist for Purposes of Pursuing Appeals of the Motion to Dismiss and Preliminary Injunction Orders [Dkt. 1645] (the "TCC II Motion for Modification").

Status. This matter is going forward.

Objection Deadline: March 23, 2022.

Related Documents:

- A. Consent Order Regarding Briefing Schedule for TCC II's Motion to Continue Existence, TCC II's Requests for Certification and TCC II's Motion for Appointment of Separate FTCT to be Heard on March 30, 2022 [Dkt. 1825, Adv. Dkt. 219]³ (the "Briefing Schedule").
- B. TCC I Reservation of Rights With Respect to TCC II Motion for Modification [Dkt. 1831].
- C. TCC I March 24, 2022 Letter to the Court [Dkt. 1847] (the "TCC I Letter").
- D. TCC II Reply in Support of TCC II Motion for Modification [Dkt. 1886].

² Hereinafter referred to as TCC II.

³ References to "Adv. Pro. Dkt." are to documents filed in Adversary Proceeding 21-03032.

Objections Received:

- E. Debtor's Objection to TCC II Motion for Modification [Dkt. 1836].
- 11. The Official Committee of Talc Claimants II March 7, 2022 Letter to the Court Regarding Future Talc Claims Representative [Dkt. 1650] (the "Letter Motion").

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. Arnold & Itkin LLP March 8, 2022 Letter to Court [Dkt. 1657].
- B. Briefing Schedule.
- C. TCC I Letter.
- D. TCC II Letter Reply in Support of Letter Motion [Dkt. 1881].

Objections Received:

- E. TCC I Objection to Letter Motion [Dkt. 1824].
- F. Arnold & Itkin LLP Objection to Letter Motion [Dkt. 1829].
- G. Debtor's Objection to Letter Motion [Dkt. 1834].
- 12. The Official Committee of Talc Claimants II, Patricia Cook, Evan Plotkin, Randy Derouen, Kristie Doyle as Estate Representative of Dan Doyle, Katherine Tollefson, and Tonya Whetsel as Estate Representative of Brandon Whetsel, for Certification of Direct Appeal to the United States Court of Appeals for the Third Circuit [Dkt. 1654] (the "TCC II Certification Motion").

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. Briefing Schedule.
- B. TCC I Letter.
- C. TCC II Reply in Support of TCC II Certification Motion [Dkt. 1888, Adv. Pro. Dkt. 225] (the "TCC II Certification Reply").
- D. Giovanni Sosa Joinder in TCC II Certification Motion [Dkt. 1883].

- E. Jan Deborah Michelson-Boyle Joinder in TCC II Certification Motion [Dkt. 1885].

Objections Received:

- F. Debtor's Omnibus Objection to Motions for Certification of Direct Appeal [Dkt. 1835, Adv. Pro. Dkt. 221] (the "Debtor's Certification Objection").
13. Request of the Official Committee of Talc Claimants I for Order Certifying Direct Appeal of the Motion to Dismiss and Preliminary Injunction Opinions and Orders to the United States Court of Appeals for the Third Circuit [Dkt. 1709, Adv. Pro. Dkt. 205] (the "TCC I Certification Motion").

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. TCC I Letter.
- B. TCC I Reply in Support of TCC I Certification Motion [Dkt. 1889, Adv. Pro. Dkt. 226] (the "TCC I Certification Reply").

Objections Received:

- C. Debtor's Certification Objection.
14. Motion for Aylstock, Witkin, Kreis & Overholtz, PLLC for Certification of Direct Appeal to the United States Court of Appeals for the Third Circuit [Dkt. 1713, Adv. Pro. Dkt. 206] (the "AWKO Certification Motion").

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. TCC I Letter.
- B. Aylstock, Witkin, Kreis & Overholtz, PLLC Reply in Support of AWKO Certification Motion [Dkt. 1887, Adv. Pro. Dkt. 224].

Objections Received:

- C. Debtor's Certification Objection.

15. Request of Arnold & Itkin LLP for Certification of Direct Appeal to the United States Court of Appeals for the Third Circuit [Dkt. 1720] (the “A&I Certification Motion”).

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. TCC I Letter.
- B. Arnold & Itkin LLP Reply in Support of A&I Certification Motion [Dkt. 1884].

Objections Received:

- C. Debtor’s Certification Objection.

MATTERS GOING FORWARD IN THE ADVERSARY PROCEEDING

16. TCC II Certification Motion.

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. Briefing Schedule.
- B. TCC II Certification Reply.

Objections Received:

- C. Debtor’s Certification Objection.

17. TCC I Certification Motion.

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. Briefing Schedule.
- B. TCC I Certification Reply.

Objections Received:

- C. Debtor’s Certification Objection.

18. AWKO Certification Motion.

Status: This matter is going forward.

Objection Deadline: March 23, 2022

Related Documents:

- A. Briefing Schedule.
- B. AWKO Certification Reply.

Objections Received:

- C. Debtor's Certification Objection.

Dated: March 28, 2022

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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